

IN THE CLAIMS

Please amend the claims as follows.

Please cancel claim 28 without prejudice.

27. (Amended) A radiation curable composition for coating a metal substrate, comprising:

- (a) an acrylate functional urethane oligomer having a hydrocarbon backbone;
- (b) one or more mono- or polyfunctional diluents;
- (c) an acidic adhesion promotor; and optionally
- (d) one or more light sensitive radical generating compounds.

49. (Amended) A radiation curable [coating] composition for coating a conductor, comprising:

- (a) an acrylate functional urethane oligomer having a hydrocarbon backbone;
- (b) one or more mono- or polyfunctional diluents;
- (c) a phosphoric acid based adhesion promotor; and optionally
- (d) one or more light sensitive radical generating compounds [;

which coating when cured with radiation has a dielectric dissipation factor at 60 Hz and 150°C of lower than about 0.2] .

Please add new claim 50.

50. (New) The composition of claim 49, wherein said conductor is a metal conductor.

REMARKS

Upon entry of this Amendment, claims 19, 27, and 29-50 will be pending, of which two are independent, namely claims 27 and 49. Reconsideration of all the objections and rejections is respectfully requested in view of the foregoing amendments and the following remarks.

Preliminarily, the specification has been amended pursuant to the Examiner's concerns regarding the drawings and the formula of the phosphate monomer on page 16. No new matter has been introduced.

Claims 27, 30-34, 36, 41-42, and 49 stands rejected under 35 U.S.C. §102 as anticipated by U.S. Patent 4,031,066 to Mori *et al.* In addition, claims 27 and 30-49 stand rejected under 35 U.S.C. §103 as being obvious over Mori *et al.* alone, and claims 19, 27, and 30-49 stand rejected under 35 U.S.C. §103 as being obvious over Mori *et al.* in view of U.S. Patent 4,786,586 to Lee *et al.* Furthermore, claims 19, 27, 29-34, 36-40, 43, and 47-49 stand rejected under 35 U.S.C. §103 as obvious over U.S. Patent 4,572,610 to Krajewski, and claims 19, 27, and 30-49 stand rejected under 35 U.S.C. §102 or, in the alternative, under 35 U.S.C. §103 as unpatentable over U.S. Patent 5,352,712 to Shustack. Finally, claims 19 and 27-49 stand rejected under 35 U.S.C. §103 as obvious over EP 0,801,041 to Szum *et al.* Applicants respectfully traverse these rejections for at least the following reasons.

The present invention relates to a radiation curable composition for coating metal substrates comprising an oligomer having a hydrocarbon backbone and an acidic adhesion promoter. The present invention further relates to a composition for coating a conductor wherein the adhesion promoter is a phosphoric acid based adhesion promoter.

With respect to Mori *et al.*, Lee *et al.*, Krajewski, and Shustack, Applicants submit that none of these references, neither alone nor in combination, teaches or suggests a radiation-curable composition comprising an acidic adhesion promoter (or a phosphoric acid based adhesion promoter). It is therefore submitted that the present invention is patentable over these references.

Regarding Szum *et al.*, the Examiner contends that it would have been obvious to one skilled in the art to include an oligomer having a hydrocarbon backbone into the compositions of Szum *et al.* See, generally, page 6 of the outstanding Office Action.

Applicants respectfully traverse the Examiner's contention and note that Szum *et al.* is directed to coating glass substrates. Accordingly, the reference can not and does not suggest that adding an oligomer having a hydrocarbon backbone to its compositions could yield

compositions suitable for coating conducting materials such as metals. It is, therefore, respectfully submitted that the present invention is patentable over Szum *et al.*

For any and all of the above reasons it is respectfully submitted that the present invention is patentable over the cited art.

CONCLUSION

Since all objections and rejections have been overcome, it is respectfully submitted that the present application is in condition for allowance and a Notice to that effect is earnestly solicited. If any questions remain, the Examiner is encouraged to call the undersigned attorney to expedite the prosecution of this application.

Respectfully submitted,

PILLSBURY MADISON & SUTRO LLP

By 

Paul L. Sharer
Reg. No. 36,004
Tel. No. (202) 861-3649
Fax No. (202) 822-0944

PLS/wdw
1100 New York Ave., N.W.
Ninth Floor - East Tower
Washington, D.C. 20005
(202) 861 - 3000

D